



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271-A Cadman Plaza East
Brooklyn, New York 11201*

May 29, 2024

By ECF

Honorable LaShann DeArcy Hall
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States of America v. Jonathan Goulbourne,
No. 22-cr-106 (LDH)*

Dear Judge DeArcy Hall:

This letter is respectfully submitted on behalf of the Metropolitan Detention Center in accordance with Your Honor's Order dated May 22, 2024, directing the filing of a status letter concerning the engagement of independent counsel for the five witnesses whom the Court has directed to appear at the evidentiary hearing.

Representation of the witnesses in accordance with 28 C.F.R. §§ 50.15–50.16 in the form of private counsel at Department of Justice expense with respect to the matters that are the subject of the Court's show cause order was approved on May 22, 2024. Thereafter, the Department notified the Federal Bureau of Prisons that private counsel at the Department's expense had been authorized, and provided a list of private attorneys for the individual witnesses to consider.

To date, we have been informed of the following:

Assistant Health Services Administrator Blake Glucksnis, BA, NRP, has retained Nicholas Kaizer, Levitt & Kaizer.

Staff Attorney Elizabeth Lynch has retained Christopher B. Harwood, Morvillo Abramowitz Grand Iason & Anello PC.

Clinical Director Bruce Bialor, M.D., Marilyn Garcia, R.N., and Lieutenant Stedman Ferguson are conferring with potential private counsel.

We respectfully propose that we provide the Court with an update by June 5, 2024, or sooner if we have the necessary information concerning the remaining witnesses.

Thank you for Your Honor's consideration of this submission.

Respectfully submitted,

BREON PEACE
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